

COMMONWEALTH OF MASSACHUSETTS  
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY

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Petition of Boston Edison Company and  
Commonwealth Electric Company, d/b/a NSTAR  
Electric, for Approvals relating to the Renegotiation  
of Purchase Power Agreements with  
Northeast Energy Associates Limited Partnership

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D.T.E. 04-85

ATTORNEY GENERAL'S SECOND SET OF  
DOCUMENT AND INFORMATION REQUESTS

The following are the Attorney General's Second Set of Information Requests in the above captioned proceeding.

INSTRUCTIONS

1. These Document and Information Requests call for all information, including information contained in documents, which relates to the subject matter of the requests and which is known or available to Boston Edison Company and / or Commonwealth Electric d/b/a NSTAR Electric or to any individual or entity sponsoring testimony or retained by the Company to provide information, advice, testimony or other services in connection with this proceeding.
2. Where a Request has a number of separate subdivisions or related parts or portions, a complete response is required to each such subdivision, part, or portion. Any objection to a Request should clearly indicate the subdivision, part, or portion of the Request to which it is directed.
3. If information requested is not available in the exact form requested, provide such information or documents as are available that best respond to the Request.
4. These requests are continuing in nature and require supplemental responses when further or different information with respect to the same is obtained.

5. Each response should be furnished on a separate page headed by the individual Request being answered. Individual responses of more than one page should be stapled or bound and each page consecutively numbered.
6. Each Document and Information Request to "Please provide all documents..." or similar phrases includes a request to "identify" all such documents. "Identify" means to state the nature of the document, the date on which it was prepared, the subject matter and the titles and the names and positions of each person who participated in the preparation of the document, the addressee and the custodian of the documents. To the extent that a document is self-identifying, it need not be separately identified.
7. For each document produced or identified in a response which is computer generated, state separately (a) what types of data, files, or tapes are included in the input and the source thereof, (b) the form of the data which constitutes machine input (e.g., punch cards, tapes), (c) a description of the recording system employed (including descriptions, flow charts, etc.), and (d) the identity of the person who was in charge of the collection of input materials, the processing of input materials, the data bases utilized, and the programming to obtain the output.
8. If a Document and Information Request can be answered in whole or part by reference to the response to another Request served in this proceeding, it is sufficient to so indicate by specifying the other Request by participant and number, by specifying the parts of the other response which are responsive, and by specifying whether the response to the other Request is a full or partial response to the instant Request. If it constitutes a partial response, the balance of the instant Request must be answered.
9. If the Company cannot answer a Request in full, after exercising due diligence to secure the information necessary to do so, state the answer to the extent possible, state why the Company cannot answer the Request in full, and state what information or knowledge is in the Company's possession concerning the unanswered portions.
10. If, in answering any of these Document and Information requests, you feel that any Request or definition or instruction applicable thereto is ambiguous, set forth the language you feel is ambiguous and the interpretation you are using responding to the Request.
11. If a document requested is no longer in existence, identify the document, and describe in detail the reasons the document is unavailable.
12. Provide copies of all requested documents. A response which does not provide the Attorney General with the responsive documents, and requests the Attorney General to inspect documents at any location is not responsive.

13. If you refuse to respond to any Document and Information Request by reason of a claim or privilege, or for any other reason, state in writing the type of privilege claimed and the facts and circumstances you rely upon to support the claim of privilege or the reason for refusing to respond. With respect to requests for documents to which you refuse to respond, identify each such document.
14. Each request for information includes a request for all documentation which supports the response provided.
15. Provide three copies of each response.
16. The term "Company" refers to Boston Edison Company and / or Commonwealth Electric Company d/b/a/ NSTAR Electric Company. Unless the request specifically provides otherwise, the term Company includes all witnesses, representatives, employees, and legal counsel.
17. Please furnish each response on a separate sheet of paper, beginning with a restatement of the question.

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D.T.E. 04-85

ATTORNEY GENERAL'S SECOND SET OF  
DOCUMENT AND INFORMATION REQUESTS

The following are the Attorney General's SECOND SET of discovery in the above referenced docket.

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| AG-2-1 | Refer to Exhibit NSTAR-GOL, page 26, lines 7-11. Please describe the nature for the incorrect calculations that were included in the Boston Edison and Commonwealth transition charge schedules and provide the dollar magnitude of each of the corrections. |
| AG-2-2 | Please provide working spreadsheet models supporting Mr. Lubbock's exhibits.   |
| AG-2-3 | Please provide working spreadsheet models supporting Mr. Hevert's exhibits.  |
| AG-2-4 | Please provide working spreadsheet models of the Company's response to AG-1-37.  |
| AG-2-5 | Please provide working spreadsheet models of the Company's response to AG-1-38.  |
| AG-2-6 | Please provide the economic analysis supporting the original selection of NEA to provide service to Boston Edison that led to the original NEA-A contract.   |
| AG-2-7 | Please provide the economic analysis supporting the original selection of NEA to provide service to Boston Edison that led to the original NEA-B contract.   |

- AG-2-8 Please provide the economic analysis supporting the original selection of NEA to provide service to Commonwealth Electric that led to the original NEA-1 contract.
- AG-2-9 Please provide the economic analysis supporting the original selection of NEA to provide service to Commonwealth Electric that led to the original NEA-2 contract.
- AG-2-10 Please provide copies of all Department orders, letters or other evidence of Department approval of the economic analysis or solicitations (RFPs) that led to the original Boston Edison contracts with NEA.
- AG-2-11 Please provide copies of all Department orders, letters or other evidence of Department approval of the economic analysis or solicitations (RFPs) that led to the original Commonwealth contracts with NEA.
- AG-2-12 Please explain why NEA is not included in the Company's proposed securitization. Provide all economic analyses supporting the decision to exclude NEA from the securitization.
- AG-2-13 Refer to Exhibit GOL-3. Please provide an update to the "Interim period Forecast" and revised, effected exhibits.
- AG-2-14 Please provide the ownership interest history from the in-service date to the present. Include the names of any entities or individuals having more than 10% interest.
- AG-2-15 Please provide the history of NEA's steam hosts from the in-service date to the present.
- AG-2-16 Please provide a copy of the Schedules (other than Schedules A and D) enumerated in the List of Schedules on page 25 of the Bellingham Execution Agreement.
- AG-2-17 Please identify, and provide if necessary, the agreements to which the schedules at pages (1) 143 to 163, (2) 269-274, (3) 349-355 and (4) 423-450 should be attached.
- AG-2-18 Please provide any pages of the BECO-A, BECO-B, CECO-1 and CECO-2 AMENDED AND RESTATED POWER PURCHASE AGREEMENTs (including any appendices, schedules or attachments) not previously provided, if any.

- AG-2-19 Please provide a copy of the Microsoft Excel spreadsheet referred to in the last sentence of subparagraph (i) of the definition of “Adjusted Bid Price Amount” on page 3 of the Bellingham Execution Agreement.
- AG-2-20 Provide the total amount of payments to be made to NEA pursuant to the Bellingham Execution Agreement. If any element of the payment(s) is presently unknown provide an explanation and example of how such amount will be determined.

DATED: November 1, 2004